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Additional Proposed Class
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MICHELLE SALINAS, RAYMEL
WASHINGTON, and AMANDA GORDON,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

BLOCK, INC. and CASH APP INVESTING,
LLC,

Defendants.

Case No. 3:22-cv-04823

The Hon. Sallie Kim

**PLAINTIFFS' AMENDED NOTICE OF
APPROVAL OF CLASS SETTLEMENT,
PROVISIONAL CERTIFICATION OF
NATIONWIDE SETTLEMENT CLASS,
AND APPROVAL OF PROCEDURE FOR
AND FORM OF NOTICE TO
SETTLEMENT CLASS**

Initial Scheduling Conference: April 22, 2024,
at 1:30 PM

TO THE COURT, ALL PARTIES AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on **June 3, 2024** at **9:30 a.m.** or as soon thereafter as the matter may be heard by the Honorable Magistrate Judge Sallie Kim of the United States District Court for the Northern District of California, San Francisco Division, located in Courtroom C – 15th Floor, at 450 Golden Gate Avenue, San Francisco, California, 94102, Plaintiffs Michelle Salinas, Raymel Washington, and Amanda Gordon, by their undersigned counsel of record, will and hereby do move for entry of an order:

(1) approving, for settlement purposes only, the certification of a Settlement Class defined as “All persons who are current or former customers of Defendants or any of Defendants’ affiliates, parents, or subsidiaries and who had their Personal Information, Cash App account, or Cash App Investing account accessed or obtained without their authorization or who otherwise had unauthorized, unintended, or fraudulent withdrawals or transfers to or from, or alleged error in connection with, a Cash App or Cash App Investing account or any linked financial account in the period of four (4) years prior to the filing of the Salinas Complaint (which was filed on August 23, 2022) through the Notice Date”; (2) directing the dissemination of Class Notice in the form and manner set forth in the Class Action settlement Agreement dated February 16, 2024 (“Settlement or Settlement Agreement”); and (3) setting a date for a Final Approval Hearing.

Plaintiffs’ Unopposed [Proposed] Order Granting Preliminary Approval of Class Action Settlement is hereby incorporated by reference from ECF No. 76-9.

PLEASE ALSO TAKE NOTICE that, after expiration of the time for Class Members to opt out or object, and upon the occurrence of the Final Approval Hearing, Plaintiffs will seek entry of a further order:

(1) granting final approval to the Settlement and entering judgment thereon;
 (2) awarding a Service Award in the amount of \$2,500 for each Class Representative; and
 (3) awarding Attorneys’ Fees and Expenses to Plaintiffs’ Counsel in the amount of twenty-five percent of the total Settlement Amount.

This Motion is based on Federal Rule of Civil Procedure 23, this Amended Notice of Motion, the supporting Memorandum of Points and Authorities hereby incorporated by reference from ECF

No. 76, the Emert Declaration hereby incorporated by reference from ECF No. 76-1, and the pleadings and papers on file in this action, and any other matter of which this Court may take judicial notice.

Dated: April 16, 2024

Respectfully submitted,

/s/ Melissa R. Emert

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Gary Graifman (admitted *pro hac vice*)

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